## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JOHN DOE,	)
	) CASE NUMBER:
	) 2:21-CV-20706-SDW-ESK
Plaintiff	)
	)
<b>v.</b>	)
	)
BAILE SEBROW	) DEFENDANT'S OPPOSITION TO
	) AFFIDAVIT OF SERVICES OF
	) PLAINTIFF'S COUNSEL
Defendant	

## DEFENDANT'S OPPOSITION TO AFFIDAVIT OF SERVICES OF PLAINTIFF'S COUNSEL

I, IRA W. HELLER, ESQ., attorney to Defendant, Betty Sebrow, improperly named as Baile Sebrow in this matter, presents this filing in the way of opposition the Affidavit of Services of Daniel S. Szalkiewicz, Esq., attorney to the Plaintiff, represented as John Doe. Defendant objects to Plaintiff's submission on the following grounds:

- 1. The Affidavit of Services Mr. Abraham Borenstein, Esq. should not be accepted by this Court, as neither Mr. Borenstein, nor his Law Firm, Borenstein, McConnell & Calpin, P.C., entered their appearance in this matter.
- 2. The Affidavit of Services Mr. Abraham Borenstein, Esq. should not be accepted by this Court, as Mr. Borenstein was never entered by Mr. Szalkiewicz as his co-counsel in this matter.
- 3. The Affidavit of Services of Mr. Abraham Borenstein, Esq. should not be accepted by this Court, as the Retainer Agreement for his Law Firm, Borenstein, McConnell & Calpin, P.C., was not attached to the Affidavit of Services as required by the Rules of this Court.

4. The Affidavit of Services of Mr. Daniel S. Szalkiewicz, Esq. should not be accepted by this Court, as the Retainer Agreement for his Law Firm, Daniel Szalkiewicz & Associates, P.C., was not attached to the Affidavit of Services as required by the Rules of this Court. .

WHEREFORE, Defendant respectfully requests, based upon the deficiencies stated above, the Affidavits of Services of Abraham Borenstein, Esq. and Daniel S. Szalkiewicz should not be accepted.

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Ira W. Heller, Esq.